

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

APRIL BARHYDT, an individual,  
Plaintiff,

vs.

MUTUAL PHARMACEUTICALS, INC.,  
UNITED RESEARCH LABORATORIES,  
PHARMACEUTICAL HOLDINGS  
CORP., AR SCIENTIFIC, INC., AR  
HOLDING COMPANY, INC.,  
Defendants.

**MOTION TO ADMIT COUNSEL  
*PRO HAC VICE***

**08-CV-5140**

TO: Michael D. Shalhoub  
Goldberg & Segalla, LLP  
170 Hamilton Avenue, Suite 203  
White Plains, NY 10601-1717

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for  
the Southern and Eastern Districts of New York, I, ELLEN RELKIN, a member in good standing  
of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant's Name: JOHN C. THORNTON  
Firm Name: Andrews & Thornton  
Address: 2 Corporate Park, Suite 110  
City/State/Zip: Irvine, California 92606  
Phone Number: 949-748-1000  
Fax Number: 949-315-3540

JOHN C. THORNTON is a member in good standing of the Bar of the State of  
California.

There are no pending disciplinary proceedings against JOHN C. THORNTON in any  
State or Federal Court.

Dated: August 22, 2008

Respectfully submitted,

By: 

Ellen Relkin (ER-9536)

180 Maiden Lane, 17th Floor  
New York, New York 10038  
(212) 558-5500  
Fax: (212) 363-2721

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

APRIL BARHYDT, an individual,  
Plaintiff,

vs.

MUTUAL PHARMACEUTICALS, INC.,  
UNITED RESEARCH LABORATORIES,  
PHARMACEUTICAL HOLDINGS CORP.,  
AR SCIENTIFIC, INC., AR HOLDING  
COMPANY, INC.,  
Defendants.

AFFIDAVIT OF ELLEN RELKIN  
IN SUPPORT OF MOTION TO  
ADMIT COUNSEL *PRO HAC VICE*

08-CV-5140

STATE OF NEW YORK )  
)SS.:  
COUNTY OF NEW YORK )

ELLEN RELKIN, being duly sworn, hereby deposes and says as follows:

1. I am of counsel to the law offices of Weitz & Luxenberg, P.C., local counsel for plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based upon my personal knowledge of the facts set forth herein and in support of Plaintiff's Motion to Admit John C. Thornton as counsel *pro hac vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in April 1985. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known John C. Thornton since 2002.

4. Mr. Thornton is a member of the firm of Andrews & Thornton in Irvine, California.

5. I have found Mr. Thornton to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move for the admission of John C. Thornton, *pro hac vice*.

1  
2 7. I respectfully submit a proposed order granting the admission of John C. Thornton, *pro*  
3 *hac vice*, which is attached hereto as **Exhibit A**.

4 WHEREFORE, it is respectfully requested that the motion to admit John C. Thornton, *pro hac*  
5 *vice*, to represent Plaintiff in the above captioned matter, be granted.

6 Dated: New York, New York  
7 August 22, 2008

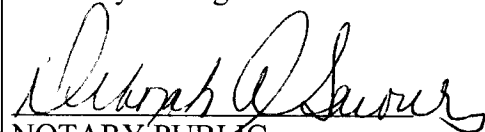
Respectfully submitted,

8 By:   
9 \_\_\_\_\_

Ellen Relkin (ER-9536)

10 180 Maiden Lane, 17th Floor  
11 New York, New York 10038  
12 (212) 558-5500  
13 Fax: (212) 363-2721

14 Sworn to before me this  
15 22nd day of August 2008

16 

17 NOTARY PUBLIC  
18 DEBORAH A. SAVOURS  
19 Notary Public, State of New York  
20 No. 01SA4944330  
21 Qualified in Nassau County  
22 Commission Expires Dec. 27, 2010  
23  
24  
25  
26  
27  
28



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

July 29, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JOHN CARLETON THORNTON, #84492 was admitted to the practice of law in this state by the Supreme Court of California on November 29, 1978; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert", is written over a horizontal line.

Kath Lambert  
Custodian of Membership Records

# EXHIBIT A

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

APRIL BARHYDT, an individual,  
Plaintiff,

vs.

MUTUAL PHARMACEUTICALS, INC.,  
UNITED RESEARCH LABORATORIES,  
PHARMACEUTICAL HOLDINGS CORP.,  
AR SCIENTIFIC, INC., AR HOLDING  
COMPANY, INC.,  
Defendants.

ORDER FOR *PRO HAC VICE* ADMISSION

08-CV-5140

Upon the motion of ELLEN RELKIN, attorney for Plaintiff, April Barhydt, and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED that**

Applicant's Name: JOHN C. THORNTON  
Firm Name: Andrews & Thornton  
Address: 2 Corporate Park, Suite 110  
City/State/Zip: Irvine, California 92606  
Phone/Fax Number: 949-748-1000; 949-315-3540  
Email Address: [jct@andrewsthornton.com](mailto:jct@andrewsthornton.com)

is admitted to practice *pro hac vice* as counsel for Plaintiff, April Barhydt in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. This action is assigned to the Electronic Case Filing (ECF) system, thus counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: \_\_\_\_\_, 2008  
White Plains, New York

SO ORDERED:

\_\_\_\_\_  
WILLAM C. CONNER, USDJ

**CERTIFICATE OF SERVICE**

I, Ellen Relkin, local counsel to the attorneys for the plaintiff, do hereby certify that a copy of the foregoing MOTION TO ADMIT COUNSEL PRO HAC VICE and proposed ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION was served upon all counsel by first-class mail, postage prepaid, this 22 day of August 2008, addressed as follows:

Anne Andrews, Esq.  
John Thornton, Esq.  
Andrews & Thornton  
*Attorneys for Plaintiff*  
2 Corporate Park, Suite 110  
Irvine, CA 92606  
Tel: (949) 748-1000  
Fax: (949) 315-3548

-and-

Michael D. Shalhoub, Esq.  
Goldberg Segalla, LLP  
*Attorneys for Defendants*  
170 Hamilton Avenue, Suite 203  
White Plains, NY 10601-1717



---

ELLEN RELKIN (ER-9536)